

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**DONNA K. SOUTTER and
TONY LEE WEBB,
For themselves and on behalf of all
similarly situated individuals.**

Plaintiff,

v.

CIVIL ACTION NO. 3:10CV00107

EQUIFAX INFORMATION SERVICES, LLC.

Defendant.

DECLARATION OF PLAINTIFF DONNA K. SOUTTER

COME NOW the Plaintiff Donna K. Soutter, and for her declaration, she states as her own personal knowledge:

1. I am one of the two named Plaintiffs in the above-styled matter. I am competent to testify as stated herein and do so on my own personal knowledge. I am familiar with the facts of my own case against Equifax.
2. I filed this lawsuit as a result of inaccurate information in my Equifax credit reports. Approximately a year and a half ago, I discovered that Equifax was reporting in my credit reports an outstanding judgment that had reportedly not been appealed, satisfied or vacated.

3. That judgment was originally obtained by Virginia Credit Union in the General District Court for the City of Richmond.

4. I understand from the Virginia Credit Union website that this creditor is headquartered at either 13505 Tredegar Lake Parkway, Midlothian, VA 23113 or 7500 Boulders View Drive, Richmond, VA 23225.

5. Equifax's reporting of the judgment was inaccurate. If Equifax had examined and actually maintained updated records, it would have found that there was an Order entered by the General District Court for the City of Richmond on March 02, 2008 that set aside and dismissed the judgment because the judgment was obtained against me in error.

6. I have filed my lawsuit against Equifax in Richmond because this is where I believe the major events in this case took place. The Virginia Credit Union judgment is located there and it was necessary for me to get that judgment removed from the Court records as an outstanding judgment through work that occurred in the City of Richmond.

7. I currently reside in Culpeper, Virginia. I have not resided in Roanoke and do not have any substantive connection with Roanoke generally or in this case.

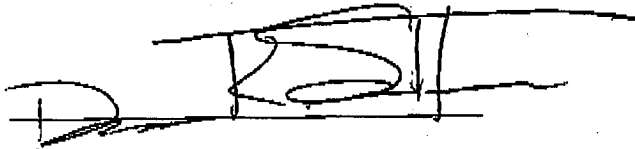
8. I want my case to stay in Richmond. Richmond is very convenient for me. I do not have to travel through Northern Virginia traffic. The distance is not unreasonable for me. I have stated my willingness to actively participate in my case in Richmond for depositions, settlement discussions or meetings and for trial. I am at least somewhat familiar with Richmond. Besides myself, I am not aware of any Virginia witnesses residing outside the Richmond metropolitan area that would be necessary for

my case. I am confident that any friends or family members who may be necessary for this case -- if any -- would assist me by traveling voluntarily to Richmond for trial.

9. I do not want my case transferred to Roanoke. Roanoke would be a much longer drive for me. I am not very familiar with Roanoke. I do not know of any witnesses there. I would be greatly inconvenienced if my case were transferred to Roanoke.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: May 21, 2010

A handwritten signature in black ink, appearing to read 'D. K. SOUTTER', written over a horizontal line.

DONNA K. SOUTTER